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7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 CAMERON L. ATKINSON,  
12 Plaintiff,  
13 v.  
14 FACEBOOK, INC., MARK ZUCKERBERG,  
15 Defendants.  
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Case No. 20-cv-05546-RS

**JOINT STIPULATION AND  
[PROPOSED] ORDER FOR  
ADMINISTRATIVE RELIEF FROM  
INITIAL CASE MANAGEMENT  
SCHEDULE PURSUANT TO LOCAL  
RULE 7-11**

Judge: Hon. Richard Seeborg

Date Filed: August 10, 2020

Trial Date: None set

Plaintiff Cameron L. Atkinson (“Plaintiff”), *in propria persona*, and Defendants Facebook, Inc. and Mark Zuckerberg (collectively, “Defendants”), by and through the undersigned counsel, stipulate and agree as follows:

WHEREAS, Plaintiff originally filed this lawsuit on November 12, 2019 in the United States District Court for the District of Connecticut;

WHEREAS, Defendants moved to dismiss the case, or in the alternative to transfer it to this Court;

WHEREAS, the District of Connecticut transferred this action to the Northern District of California on July 27, 2020;

WHEREAS, Defendants filed a renewed motion to dismiss Plaintiff’s claims in their entirety as well as a request for judicial notice on August 31, 2020;

WHEREAS, Plaintiff notified the Court on September 17, 2020 that he had been unable to obtain local counsel and intended to proceed *pro se*;

WHEREAS, the Court ordered Plaintiff’s prior counsel of record to file a consent to substitution of counsel on the same day Plaintiff informed the Court of his intention to proceed *pro se*;

WHEREAS, the Court, on its own motion, continued the hearing on Defendants’ renewed motion to dismiss, originally set for October 15, 2020, to December 3, 2020 at 1:30 p.m.;

WHEREAS, Plaintiff’s prior counsel filed a consent to substitution of counsel on October 5, 2017;

WHEREAS, the initial case management conference is set for November 12, 2020 at 10:00 a.m.;

WHEREAS, Defendants’ motion to dismiss seeks dismissal with prejudice of every cause of action Plaintiff asserts in both his original and supplemental complaints;

WHEREAS, the resolution of Defendants’ motion to dismiss will provide the parties and the Court with significant clarity with respect to the remaining issues in the case and the prospect of a negotiated resolution;

WHEREAS, resetting the Initial Case Management conference and all corresponding

1 deadlines to a date thirty days after the Court decides Defendants' motion to dismiss will best  
2 serve the purposes of judicial economy and conserve party resources;

3 IT IS THEREFORE HEREBY STIPULATED, subject to Court approval, that:

- 4 1. The Initial Case Management Conference currently scheduled for November 12, 2020  
5 at 10:00 a.m. (Doc. 58) and all related deadlines shall be continued;
- 6 2. The Court shall re-schedule the Initial Case Management Conference and all related  
7 deadlines upon final determination of Defendants' motion to dismiss.

8 SO STIPULATED AND AGREED.

9  
10 Dated: October 19, 2020

KEKER, VAN NEST & PETERS LLP

11 By: /s/ Nicholas R. Green

12 PAVEN MALHOTRA  
13 NICHOLAS GREEN

14 Attorneys for Defendants Facebook, Inc.  
and Mark Zuckerberg

15 Dated: October 19, 2020

PLAINTIFF CAMERON L. ATKINSON

17 By: /s/ Cameron L. Atkinson

18 CAMERON L. ATKINSON

19 Plaintiff, *in propria persona*

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

21 Dated: \_\_\_\_\_, 2020

22 \_\_\_\_\_  
23 Honorable Richard Seeborg  
United States District Judge

**CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES**

I, Nicholas R. Green, am the ECF user whose ID and password are being used to file this Joint Stipulation And [Proposed] Order for Relief from Initial Case-Management Schedule. In compliance with N.D. Cal. Civ. L.R. 5-1(i)(3), I hereby attest that I have obtained the concurrence of each signatory to this document.

/s/ Nicholas R Green

Nicholas R. Green

PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Keker, Van Nest & Peters LLP, 633 Battery Street, San Francisco, CA 94111-1809.

On October 19, 2020, I served the following document(s):

**JOINT STIPULATION AND [PROPOSED] ORDER FOR  
ADMINISTRATIVE RELIEF FROM INITIAL CASE MANAGEMENT  
SCHEDULE PURSUANT TO LOCAL RULE 7-11**

- ☒ by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

Cameron L. Atkinson  
[atkinsoncameronl@gmail.com](mailto:atkinsoncameronl@gmail.com)

Executed on October 19, 2020, at San Francisco, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

/s/ Nicholas R. Green  
Nicholas R. Green